

REMARKS

Reconsideration of this application, in view of the foregoing amendment and the following remarks, is respectfully requested.

Claims 11-72 were originally presented for consideration in this application after preliminary amendment. Claims 14, 39 and 61 have been canceled. Accordingly, claims 11-13, 15-38, 40-60 and 62-72 are currently pending in this application.

The examiner's indication that claims 32-34, 48 and 49 contain allowable subject matter is noted with appreciation.

The following rejections were set forth in the Office Action:

1. Claims 11-15, 17-31, 35-43, 45-47 and 50-72 stand rejected under 35 USC §102(b) as being anticipated by U.S. Patent No. 4,505,332 to Mills et al.; and
2. Claims 16 and 44 stand rejected under 35 USC §103 as being unpatentable over Mills.

Regarding the anticipation rejections based on the Mills reference, please note that independent claims 11, 38, 52 and 62 have been amended above. Claim 11 now includes the limitation (formerly recited in claim 14) that the actuator includes a setting initiation device which applies a first biasing force to the force transmission device in response to pressure in the well, with the first biasing force being greater than, and oppositely directed relative to, a second biasing force applied to the force transmission device by the pistons in response to pressure in the well. The Mills reference does not describe such a setting initiation device which applies a biasing force in an opposite

direction and greater than the biasing force applied to the force transmission device by the pistons.

Claim 38 now includes the limitation (formerly recited in claim 39) that the step of increasing pressure, which causes the pistons to displace, includes admitting the pressure through a rupture disc. The Mills reference does not describe such a step. The plugs P and PP are definitely not rupture discs as this term is understood to those skilled in the art. Instead, a rupture disc is a frangible device in which a pressure bearing member ruptures and allows fluid communication through the member when it ruptures.

Claim 52 now includes the limitation (formerly in claim 61) that the actuator is positioned between the seal element and the slip assembly. Claim 52 and independent claim 62 have further been amended to make it clear that the actuator is positioned longitudinally between the seal element and the slip assembly. The Mills reference does not describe this feature of the invention.


Therefore, it may be seen that the independent claims 1, 38, 52 and 62 are not anticipated by the Mills reference. Accordingly, the examiner is respectfully requested to withdraw the rejections of these claims and their dependents.

In view of the foregoing amendment and remarks, all of the claims pending in this application are now seen to be in a condition for allowance. A Notice of Allowance of claims 11-13, 15-38, 40-60 and 62-72 is therefore earnestly solicited.

The examiner is hereby requested to telephone the undersigned attorney of record at (972) 516-0030 if such would expedite the prosecution of the application.

Respectfully submitted,

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on JULY 13, 2006
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